

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company
(U902M) for Review of its Safety Model Assessment
Proceeding Pursuant to Decision 14-12-025.

And Related Matters.

Application 15-05-002
(Filed May 1, 2015)

Application 15-05-003
Application 15-05-004
Application 15-05-005

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM
NETWORK FOR CONTRIBUTION TO DECISION 16-08-018**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 16-08-018
Claimed: \$204,622.57	Awarded: \$204,473.20
Assigned Commissioner: Michael Picker	Assigned ALJ: Colette Kersten

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 16-08-018, among other things, adopted on an interim basis the risk assessment model jointly offered by TURN and Indicated Shippers/Energy Producers and Users Coalition (IS/EPUC) (collectively, Joint Intervenor), directed further steps to evaluate risk assessment models in Phase 2, prescribed requirements for Risk Assessment Mitigation Phase (RAMP) filings, and approved an interim roadmap for migrating to improved quantitative methods for optimized risk mitigation.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util.
Code §§ 1801-1812:**

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	7/27/15	Verified

PROPOSED DECISION

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	8/26/15	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.14-05-001	Verified
6. Date of ALJ ruling:	9/5/14	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001	Verified
10. Date of ALJ ruling:	9/5/14	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-08-018	Verified
14. Date of issuance of Final Order or Decision:	8/29/16	Verified
15. File date of compensation request:	10/3/16	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
1. Adoption of Joint Intervenor “multi-attribute” model on an interim basis: As one of the Joint Intervenors, TURN introduced an alternative risk assessment and mitigation model (often referred to in the Decision as the “multi-attribute approach”) which Joint Intervenors contended improved upon various flaws and shortcomings of the	“Intervenor Perspective Regarding an Improved Methodology to Promote Safety and Reliability of Electric and Natural Gas Service in California,” 1/28/16, Attachment 1 to 1/29/16 ALJ Ruling Entering Intervenor White Paper Into the Record and Seeking Comments	Verified

PROPOSED DECISION

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>utilities' models presented in this case. Joint Intervenor proposed that the Commission require the utilities to adopt the main elements of the Joint Intervenor Approach.</p> <p>The Decision adopted the Joint Intervenor Approach and its essential elements on an interim basis, subject to further "test drives" of the Approach in Phase 2.</p>	<p>("Joint Intervenor White Paper").</p> <p>Comments of EPUC/IS and TURN on the Joint Intervenor White Paper, 2/12/16.</p> <p>Opening Comments of IS/EPUC and TURN on the Staff Evaluation Report, 4/11/16, pp.14-20.</p> <p>D.16-08-018, pp. 2, 114, 130 (noting that Joint Intervenor, "in cooperation with consultants, provided valuable, 'on the record,' long- and short-term approaches to a practical risk management framework that have the potential to help meet Commission goals"), 164.</p>	
<p>2. Limitations of utilities' risk assessment/mitigation models:</p> <p>As one of the Joint Intervenor and supported by the analysis of Joint Intervenor's experts, TURN pointed out significant flaws and limitations in the utilities' models, including: the inability of the models of PG&E and Sempra models to calculate risk reduction, and technical problems with the utilities' use of 7x7 matrices, non intuitive logarithmic scales and non-probabilistic 1-7 scores for likelihood and consequences of failure. TURN pointed out that the utilities appeared vested in their models and that the process ordered in D.14-12-025 would lose time and momentum if the Commission did not direct the utilities to make fundamental changes to their models.</p> <p>The Decision agreed with Joint Intervenor's assessment of the utilities' models in most respects.</p>	<p>Joint Intervenor White Paper, 1/28/16, pp.12-15, 25-27.</p> <p>Opening Comments of IS/EPUC and TURN on the Staff Evaluation Report, 4/11/16, pp. 6-7, 13-14.</p> <p>Reply Comments of IS/EPUC and TURN on the Staff Evaluation Report, 4/25/16, pp. 2, 5-7.</p> <p>D.16-08-018, pp. 11 (utilities' current models do not meet Commission expectations), 57-58, and 112-113.</p>	Verified
<p>3. Value of uniformity of risk assessment/mitigation models:</p>	<p>Comments of TURN on ALARP and Utility Uniformity Report, 1/15/16, pp. 3-4.</p>	Verified

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>TURN argued that: having the utilities use more uniform models was highly desirable and efficient; uniformity should not be based on the utilities' current inadequate models, but rather on a model based on the Joint Intervenor Approach; the Commission should pursue additional uniformity in a second phase of this case.</p> <p>Consistent with TURN's positions, the Decision finds that adopting a common framework based on features of the Joint Intervenor Approach would promote efficiency and should be further pursued in Phase 2.</p>	<p>Opening Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/11/16, p. 19.</p> <p>Reply Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/25/16, pp. 6-7.</p> <p>D.16-08-018, p. 58, Conclusions of Law 12, 17.</p>	
<p>4. Role of ALARP (As Low as Reasonably Practicable) framework:</p> <p>TURN recommended that, before devoting significant resources to the challenging steps of implementing ALARP, the Commission should focus on adopting a methodology to prioritize and optimize risk mitigation portfolios.</p> <p>The Decision agreed with TURN's recommendation.</p>	<p>Comments of TURN on ALARP and Utility Uniformity Report, 1/15/16, pp. 1-3.</p> <p>Comments of EPUC/IS and TURN on the Intervenor White Paper, 2/12/16, pp. 7-8</p> <p>D.16-08-018, p. 78.</p>	Verified
<p>5. Risk Lexicon Working Group:</p> <p>TURN was an active participant in the Risk Lexicon Working Group (RLWG) that, in the course of several conference calls, agreed on definitions of key terms. TURN's attorney, Thomas Long, formally represented TURN on the RLWG, actively pursuing definitions that were clear and understandable and that were supported the objectives for the risk model process set forth in D.14-12-025. The RLWG was ultimately able to reach a consensus on the definitions it addressed. As one of the Joint Intervenor, TURN also opposed SED's proposal to modify certain definitions agreed to by the RLWG.</p> <p>The Commission adopted the definitions agreed to by the RLWG and agreed with Joint</p>	<p>Opening Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/11/16, pp. 27-28.</p> <p>D.16-08-018, pp. 30-31, Conclusion of Law 5.</p> <p>(See Comment #1 below.)</p>	Verified

PROPOSED DECISION

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Intervenors' position that changes to those definitions should not be accepted at this time.		
<p>6. Role of subject matter expertise in risk analysis:</p> <p>As one of the Joint Intervenors, TURN advocated that subject matter experts (SME) could provide important information for risk scoring and that sensitivity analysis could help to determine where additional data is needed.</p> <p>The Decision agreed with Joint Intervenors that SME input is essential and can help to focus where additional data is needed.</p>	<p>Reply Comments of EPUC/IS and TURN on the Intervenor White Paper, 2/12/16, pp. 23-24.</p> <p>Reply Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/25/16, p. 9.</p> <p>D.16-08-018, p. 128.</p>	Verified
<p>7. RAMP filing requirements:</p> <p>As one of the Joint Intervenors, TURN advocated that: (1) the utilities' RAMP filings should include calculations of risk reduction and a ranking of mitigations based on risk reduction per dollar spent; and (2) the Commission should reject SED's proposal for an SED "adoption order".</p> <p>The Decision agreed with Joint Intervenors' recommendations.</p>	<p>Opening Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/11/16, pp. 14, 25-26.</p> <p>D.16-08-018, pp. 3, 152-153.</p>	Verified
<p>8. Road Map for risk analysis:</p> <p>As one of the Joint Intervenors, TURN contended that SED's report placed too much emphasis on long-term objectives and did not sufficiently focus on the short-term need to require the utilities to calculate risk reduction in order to prioritize risk mitigations.</p> <p>The Decision agreed that too much focus had been placed on long-term goals and that more attention should be paid to the near-term goal of developing a good risk-scoring model.</p>	<p>Opening Comments of EPUC/IS and TURN on the Staff Evaluation Report, 4/11/16, pp. 3, 7-9.</p> <p>D.16-08-018, pp. 171-172.</p>	Verified
9. Modifications to the Proposed Decision (PD):	Opening Comments of EPUC/IS	Verified

PROPOSED DECISION

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>As one of the Joint Intervenor, TURN's comments on the PD (among other points): (1) advocated that the PD be modified to make clear that PG&E's next RAMP should include its gas transmission and storage operations; (2) opposed utility efforts to require more "vetting" of the Joint Intervenor model before adopting it on an interim basis; and (3) sought corrections to the description of the Joint Intervenor Approach.</p> <p>The Decision agreed with Joint Intervenor's recommendations and made changes to the description of the Joint Intervenor Approach consistent with Joint Intervenor comments.</p>	<p>and TURN on Proposed Decision, 7/5/16, pp. 3-8.</p> <p>Reply Comments of EPUC/IS and TURN on Proposed Decision, 7/11/16, pp. 4-5.</p> <p>D.16-08-018, pp. 118, 155, 177.</p>	
<p>10. Reports/Metrics Working Group:</p> <p>TURN actively participated in the performance metrics working group, represented by Mr. Long. TURN contributed to the analysis of the usefulness of proposed metrics and recommended additional information – such as whether the metrics are prone to bias and whether the data is auditable -- that would be helpful to assess the value and reliability of proposed metrics.</p> <p>The Decision acknowledges the work done to date and directs the continuation of the work of this working group.</p>	<p>D.16-08-018, pp. 161-162.</p> <p>(See Comment #1 below.)</p>	Verified

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes, though ORA joined late in case	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: As noted above, TURN jointly sponsored a risk model and took joint positions with Indicated Shippers and Energy		Verified

Producers and Users Coalition (IS/EPUC). At various times, TURN also consulted and coordinated with UCAN, Mussey Grade Road Alliance (MGRA), and Coalition of Utility Employees (CUE).	
<p>d. Intervenor’s claim of non-duplication:</p> <p>TURN can reasonably lay claim to serving as the lead advocate for residential and small commercial consumer interests throughout this proceeding, particularly because ORA did not become active in the proceeding until late in the case, after the workshops had concluded. As TURN’s time records show (as indicated by the code “Coord”) TURN actively coordinated with other parties to find common ground and avoid unnecessary duplication where possible. Quite often, the coordination took the form of TURN serving as the lead spokesperson for various issues at the workshops and in pleadings, with other parties offering complementary or contrasting positions as appropriate. A key example of TURN’s lead role among consumer representatives was TURN’s sponsorship of an alternative risk model that found support in many respects from UCAN and MGRA and that articulated and addressed many of their concerns.</p> <p>The best example of TURN’s efforts to avoid duplication was its decision to engage in an unusual joint effort with IS/EPUC to co-sponsor the Joint Intervenor Approach, a detailed and complex risk model that was presented by Joint Intervenor’s experts. As TURN’s time records reveal, the preparation for the workshop presentation and post-workshop explanation of the Joint Intervenor Approach was labor-intensive and involved a good deal of back and forth with the experts and the attorneys for IS/EPUC. Through that joint effort, TURN and EPUC/IS were able to avoid an unnecessary duplication of effort and to share costs for an expensive undertaking. With the Commission’s endorsement of many features of the Joint Intervenor Approach in D.16-08-018, the joint effort achieved very positive results.</p> <p>In addition, TURN notes that, in a proceeding such as this where many stakeholder groups are encouraged to participate, some degree of duplication may be practically unavoidable. The Commission should find that TURN was successful in structuring its participation in a manner that avoided unnecessary duplication to a high degree. Accordingly, the award of intervenor compensation should not be reduced due to duplication concerns.</p>	Verified

C. Additional Comments on Part II:

#	Intervenor’s Comment	CPUC Discussion
1	<p>Working Group Participation:</p> <p>The Commission has historically encouraged the use of working groups to resolve complex issues among multiple stakeholders, and</p>	

	has held that compensation for working group activities is appropriate, especially when the working groups are created pursuant to Commission direction. See, for example, D.15-07-019 (Granting compensation to TURN for activities in two working groups); D.97-02-047, mimeo. p. 2; D.96-08-040, 67 CPUC 2d 562, 568.	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>TURN's request for intervenor compensation seeks an award of approximately \$205,000 as the reasonable cost of our participation in the proceeding to date.¹ In light of the quality of TURN's work, the complexity of the risk models, the importance of the issues addressed in this phase of the proceeding, and the magnitude of TURN's substantial contribution to the proceeding and the resulting decision, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>TURN's advocacy reflected in D.16-08-018 addressed policy and process matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.16-08-018, given the nature of the issues presented. While it is difficult to place a dollar value on such issues, TURN submits that our participation should result in substantial benefits in the form of a more consistent and more transparent presentation and analysis of safety and risk-related issues in GRCs going forward. In addition, a key purpose of TURN's advocacy of the Joint Intervenor Approach was to fulfill the Commission's expressed desire in D.14-12-025 to enable comparison of risk mitigations based on risk reduction per dollar spent. Given the Commission's very substantial reliance in the final decision on the Joint Intervenor Approach to illustrate the comparative shortcomings of the utilities' approaches, there should be no dispute that the benefits of TURN's participation far exceed the cost of that participation.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable given the issues at stake in the rulemaking and the adopted outcomes.</p>	Verified

¹ TURN has excluded from this request hours recorded after the issuance of D.16-08-018 that are appropriately assigned to the second phase of this proceeding. TURN's expectation is that those hours will likely be included in a request for compensation associated with a Commission decision on the second phase issues, should TURN file such a request.

<p>b. Reasonableness of hours claimed:</p> <p>TURN seeks compensation for a total of approximately 420 hours devoted to this phase of the proceeding, covering periodic work over much of 2015 and 2016. This is the equivalent of about 10 weeks of full-time work and includes active participation in 5 workshops, preparation of 10 pleadings and a white paper explaining the Joint Intervenor Approach, as well as participation in two working groups. Given the range and magnitude of TURN's substantial contribution to the proceeding, the Commission should find the number of hours reasonable in total. If the Commission looks to the time devoted to particular tasks, such as preparing and participating in workshops, presenting and explaining the Joint Intervenor Approach, or reviewing the comments of several other parties in order to prepare reply comments and such, it should reach the same conclusion on a task-specific basis. The work was performed very efficiently, and the number of hours for each TURN representative was reasonable under the circumstances present here.</p> <p><u>TURN's Attorney and Consultants:</u></p> <p>Thomas Long served as TURN's sole attorney throughout this proceeding. Mr. Long brought considerable subject matter expertise from his extensive participation in R.13-11-006, the proceeding that (in D.14-12-025) ordered the filing of S-MAP applications and set the stage for future RAMP proceedings. In addition, Mr. Long benefitted from his working knowledge of PG&E's risk models resulting from his participation in PG&E's GT&S case (A.13-12-012) and PG&E's 2014 (A.12-11-009) and 2017 (A.15-09-001) GRCs. As a result, Mr. Long was able to address the complex issues presented in this case extremely efficiently, with very little need for any special training or background reading and research.</p> <p>TURN relied on the considerable expertise of consultants that it jointly retained with IS/EPUC, Charles Feinstein and Jonathan Lesser. Their work included the presentation of the Joint Intervenor Approach at the fifth workshop, the preparation of the associated white paper, preparation of a Technical Appendix to respond to certain questions raised by parties in opening comments on the white papers, and otherwise helping Mr. Long and the attorneys for IS/EPUC to explain the Joint Intervenor Approach in later pleadings in the case. TURN only seeks compensation for the share of these experts' hours that was billed to TURN. The decision to jointly retain experts with other parties was an unusual one for TURN, but it enabled TURN to feel more comfortable taking on the risk of presenting a risk model approach that was new to the Commission and devoting the considerable resources that were necessary to explaining the Joint Intervenor Approach. The benefit of this joint effort was to enable TURN to move ahead with an undertaking it might not otherwise have pursued, as well as reducing the cost to ratepayers who ultimately pay for awards of intervenor compensation.</p> <p>TURN submits that the Commission should find reasonable the number of hours for Mr. Long, Dr. Feinstein and Dr. Lesser that are included in the request.</p> <p><u>Travel Time and Expenses:</u></p>	<p>Verified</p>
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<p>TURN includes the following travel time in its request: (1) six hours for Dr. Lesser to travel from his home outside Albuquerque, New Mexico to the January 25, 2016 CPUC workshop, and back home; (2) three hours for Dr. Feinstein to travel to that workshop from his home in Sea Ranch, California, and back home; and (3) three hours for Dr. Feinstein to travel to a necessary in-person meeting in San Francisco for the purpose of explaining his risk model to the TURN and IS/EPUC attorneys. TURN is only including the share of travel hours that was billed to TURN. Moreover, with respect to that share and consistent with Commission policy, TURN is charging for only 50% of the travel time.</p> <p>In addition, this request includes \$380.54 in air fare expenses paid by TURN for Dr. Lesser's round-trip air travel from Albuquerque to San Francisco for the 1/25/16 workshop. Consistent with the sharing arrangement with IS/EPUC, TURN paid one-half of Dr. Lesser's total air fare expenses, resulting in a reduced claim of costs in this compensation request.</p> <p><u>Compensation Request Preparation Time:</u> TURN is requesting compensation for 11.5 hours devoted to compensation-related matters, primarily preparation of this request for compensation (10.5 hours). This is a small number of hours for preparing a compensation request, particularly for a proceeding with over 350 time entries and expert consultants whose time is being claimed and hourly rates justified in a compensation request for the first time. The Commission should find it a reasonable figure. Mr. Long prepared this request for compensation because his knowledge of all aspects of this proceeding, resulting from his role as TURN's sole attorney in this case.</p> <p><u>Summary:</u> In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's success on the merits.</p>									
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in this proceeding.</p> <table border="1" data-bbox="183 1507 1164 1892"> <thead> <tr> <th>Code</th><th>Stands for:</th></tr> </thead> <tbody> <tr> <td>GP</td><td>General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the applications and testimony and parties' pleadings, and other tasks that are of a more general nature, such as preparing for and participating in prehearing conferences.</td></tr> <tr> <td>Coord</td><td>Coordination with other parties.</td></tr> <tr> <td>ALARP</td><td>Work related to the As Low As Reasonably Practicable (ALARP) framework.</td></tr> </tbody> </table>	Code	Stands for:	GP	General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the applications and testimony and parties' pleadings, and other tasks that are of a more general nature, such as preparing for and participating in prehearing conferences.	Coord	Coordination with other parties.	ALARP	Work related to the As Low As Reasonably Practicable (ALARP) framework.	Verified
Code	Stands for:								
GP	General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the applications and testimony and parties' pleadings, and other tasks that are of a more general nature, such as preparing for and participating in prehearing conferences.								
Coord	Coordination with other parties.								
ALARP	Work related to the As Low As Reasonably Practicable (ALARP) framework.								

JI Model	Work related to the presentation and explanation of the Joint Intervenor Approach to risk assessment and development of risk mitigation portfolios.	
Lexicon	Work related to the Risk Lexicon Working Group and risk lexicon issues generally.	
RAMP	Work related to requirements and guidance for utility Risk Assessment and Mitigation Phase (RAMP) showings.	
Reports	Work related to accountability reports and performance metrics, including participation in the working group formed by SED concerning these topics.	
Risk-Gen	Work related to issues of general applicability to all risk models, such as cost effectiveness, calculation of risk reduction, and role of subject matter experts.	
Util Models	Work related to analysis of risk models presented by the utilities.	
Travel	Time devoted to consultant travel to meetings and workshops.	
PD	Proposed Decision -- work on reviewing, analyzing, commenting on, lobbying on, strategizing on the Proposed Decision and revisions thereto.	
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries as follows among broader issue-specific categories described above that were most likely to have work covered by a # entry: JI Model – 45%, Util Models – 40%, Risk-Gen – 6%, Lexicon – 5%, ALARP – 4%.	
Comp	Time devoted to compensation-related pleadings.	
TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.		

PROPOSED DECISION**B. Specific Claim:***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Thomas Long	2015	106.75	\$570	D.15-06-021 (see comment 1)	\$60,277.50	105.50 ^[A]	\$570.00	\$60,135.00
T. Long	2016	150.25	\$575	Res. ALJ-329 (see comment 1)	\$86,393.75	150.25	\$575.00	\$86,393.75
Charles Feinstein	2015	3.75	\$350	See Comment 2	\$1,312.50	3.75	\$350.00	\$1,312.50
C. Feinstein	2016	70.65	\$350	See Comment 2	\$24,727.50	70.65	\$350.00	\$24,727.50
Jonathan Lesser	2015	4.38	\$350	See Comment 2	\$1,533.00	4.38	\$350.00	\$1,533.00
J. Lesser	2016	70.19	\$350	See Comment 2	\$24,566.50	70.19	\$350.00	\$24,559.50
Subtotal: \$198,810.75						Subtotal: \$198,661.30		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Travel time for C. Feinstein	2015 and 2016	6.0	\$175	½ of requested rate	\$1,050.00	6	\$175.00	\$1,050.00
Travel time for J. Lesser	2015 and 2016	6.0	\$175	½ of requested rate	\$1,050.00	6	\$175.00	\$1,050.00
Subtotal: \$2,100.00						Subtotal: \$2,100.00		
INTERVENOR COMPENSATION CLAIM PREPARATION**								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
T. Long	2015	1.0	\$285.00	½ of 2015 rate	\$285.00	1.0	\$285.00	\$285.00
T. Long	2016	10.5	\$287.50	½ of 2016 rate	\$3,018.75	10.5	\$287.50	\$3,018.75
Subtotal: \$3,303.75						Subtotal: \$3,303.75		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopying	Copies made of TURN pleadings for service			\$11.70	\$11.70		
	Postage	Expenses for postage for this proceeding			\$13.06	\$13.06		
	Travel expenses	Expenses for round trip air travel by Dr. Lesser from Albuquerque to San Francisco (and return) for presentation at 1/25/16 workshop			\$380.54	\$380.54		
	Telephone	Long-distance calls associated with work on this proceeding			\$2.77	\$2.77		

PROPOSED DECISION

Subtotal: \$408.07		Subtotal: \$408.07	
TOTAL REQUEST: \$ 204,622.57		TOTAL AWARD: \$204,473.20	
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Thomas Long	December 1986	124776	No

C. CPUC Disallowances and Adjustments:

Item	Reason
A	The Commission finds reasonable rates of \$350 per hour for Feinstein and Lesser, based on their more than 30 years of experience performing economic analyses.
B	Reduction to Long's 2015 hours of 0.25 hours for time spent on 5/21 discussing personnel matters.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D. 16-08-018.
2. The requested hourly rates for The Utility Reform Network's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$204,473.20.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network is awarded \$204,473.20.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southern California Edison Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas revenues for the 2016 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 17, 2016, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No.
Contribution Decision(s):	D1608018		
Proceeding(s):	A1505002; A1505003; A1505004; A1505005		
Author:	ALJ Kersten		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric, Southern California Gas Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	10/03/16	\$204,622.57	\$204,473.20	N/A	Non-compensable Costs

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Thomas	Long	Attorney	TURN	\$570.00	2015	\$570.00
Thomas	Long	Attorney	TURN	\$575.00	2016	\$575.00
Charles	Feinstein	Expert	TURN	\$350.00	2015	\$350.00
Charles	Feinstein	Expert	TURN	\$350.00	2016	\$350.00
Jonathan	Lesser	Expert	TURN	\$350.00	2015	\$350.00
Jonathan	Lesser	Expert	TURN	\$350.00	2016	\$350.00

(END OF APPENDIX)